

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

MICHAEL J. GOODMAN and LINDA BROWN,
individually and on behalf of all others similarly
situated,

Civ. No. 09-5603(LDW)(ARL)

Plaintiffs,
v.

GENWORTH FINANCIAL WEALTH
MANAGEMENT, INC., GENWORTH FINANCIAL,
INC. and GURINDER S. AHLUWALIA,

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Memorandum of Law, the
accompanying Declaration of Reid Ashinoff dated June 24, 2010 and the exhibits annexed
thereto and the accompanying Declaration of Jeffrey Joseph dated June 24, 2010 and the exhibits
annexed thereto, the undersigned will move this Court for an Order dismissing the Complaint
pursuant to Federal Rule of Civil Procedure (“FRCP”) 12(b)(6), FRCP 9(b), the Private
Securities Litigation Reform Act and the Securities Litigation Uniform Standards Act.

Dated: June 24, 2010

Respectfully submitted,

SONNENSCHEIN NATH & ROSENTHAL LLP

By: Reid L. Ashinoff
Reid L. Ashinoff
Sandra D. Hauser
Brendan E. Zahner

1221 Avenue of the Americas
New York, New York 10020-1089
Tel: (212) 768-6700
Fax: (212) 768-6800
rashinoff@sonnenschein.com
shauser@sonnenschein.com
bzahner@sonnenschein.com

Counsel for Defendants